

MAR 30 1994

R-19J

The Honorable Jerry Costello  
Member, United States House  
of Representatives  
327 W. Main Street  
Belleville, Illinois 62220

Dear Mr. Costello:

Thank you for your letter of March 1, 1994, regarding updated information on the National Priorities List (NPL) evaluation of the Dead Creek area in Sauget and Cahokia, Illinois.

In general, a site is proposed for the NPL by preparation of a Hazard Ranking System (HRS) scoring package. If the site score exceeds 28.5, it is submitted to the United States Environmental Protection Agency (U.S. EPA) Headquarters for Quality Assurance/Quality Control (QA/QC). The QA/QC revisions are forwarded to the Region who then prepares the final draft package. This final draft is then forwarded by U.S. EPA Headquarters to the Office of Management and Budget (OMB) who reviews all potential NPL candidate sites. If the site passes OMB review, the site is then proposed draft to the NPL by publication in the Federal Register. A sixty day comment period then follows and the EPA must respond to all comments that are received before that site can be proposed final on the NPL. The final proposal is also published in the Federal Register.

Currently, we are evaluating this area, known as Sauget Area 1 under the site assessment program, as a candidate for the National Priorities List. Since we are in the early stages of this process, we cannot discuss the specifics of this particular HRS package since it is considered predecisional. In addition to the HRS review, the U.S. EPA has also begun the evaluation of Potentially Responsible Parties (PRPs) to determine the likelihood of an enforcement action at this site.

I have enclosed a copy of a briefing memorandum that was prepared for our Agency by the Illinois Environmental Protection Agency (IEPA). As you know, the IEPA is actively involved in evaluating the Sauget Area and has provided most of the site assessment information, to date. Their fact sheet gives a brief description of the various sites which constitute Sauget Area 1. Since receipt of your previous letter sent by IEPA on December 9, 1993, the IEPA in response to a citizen complaint sampled at Site M on

March 11, 1994. Initial review of the sample results reveal similar compounds as indicated before. The Illinois Dept. of Health (IDPH), in conjunction with the IEPA, are reviewing the results and will provide their final determination to the City of Cahokia.

If you have any additional questions, please contact me. Thank you for your interest in this matter.

Sincerely yours,

/s/ original signed by  
William Sanders III

Valdas V. Adamkus  
Regional Administrator

Enclosure

bcc: ORA w/control slip  
M. Canavan, ORA  
AL w/control slip  
K. Westlake, ORA  
P. Takacs, IEPA  
J. Gore, RRB  
S. Borries, ERB  
T. Martin, ORC  
S. Pastor, OPA  
R. Webb, OSF, w/control slip  
M. Johnson, ERB, w/control slip  
N. Maier, WMD, w/control slip

JERRY F. COSTELLO

12TH DISTRICT ILLINOIS

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# Congress of the United States

House of Representatives

Washington, DC 20515-1312

March 1, 1994

Mr. Alan Altur  
Site Assessment Manager  
EPA, Site Assessment Section  
Office of Superfund  
77 W Jackson  
Chicago, IL 60604

RECEIVED  
MAR 4 1994

SITE ASSESSMENT SECTION

Dear Mr. Altur:

I am writing in regard to Dead Creek in Cahokia, Illinois and I am interested in obtaining updated information as to the EPA's progress with this matter.

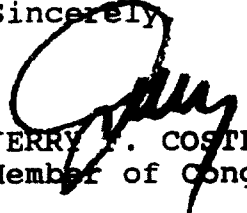
Recently, I held a town hall meeting in Cahokia and was confronted by several concerned residents. I am considering holding a special meeting in the area and inviting all concerned parties in an effort to bring them up-to-date on this issue.

Enclosed you will find a copy of the letter I received on December 9, 1993 from Mr. Tom Walters, Legislative Liaison with the Illinois EPA. As I understand, the process of becoming included in the National Priorities List is lengthy. Any further information you could provide me would be appreciated.

If you have any questions please feel free to contact my office manager Anne Risavy at 618/233-8026. Please forward any correspondence to my office address marked below.

Mr. Altur, thank you for your attention to this matter and I look forward to hearing from you.

Sincerely

  
JERRY F. COSTELLO  
Member of Congress



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

(217) 782-3397

December 9, 1993

The Honorable Jerry Costello  
United States Congressman  
1363 Niedringhaus Avenue  
Granite City, Illinois 62040

Dear Congressman Costello:

Thank you for your letter of November 23, 1993 in which you requested information regarding Dead Creek in Cahokia, Illinois. The following information is to address the questions and concerns of your constituents, Richard and Diane McDonnell.

## Studies have found "30 different chemicals" in Dead Creek:

Environmental studies have found contamination in Dead Creek, but the most significant problem from a human health standpoint is the **PCB-contaminated sediment** at the bottom of the creek bed. **PCBs (Polychlorinated Biphenyls)** do not move readily in groundwater, since they tend to bind tightly to soil particles. There might be an increased hazard if the sediment were to be transported downstream (through pumping from the creek-bottom, or opening the culvert at the creek-bottom under Judith Lane, for example). However, in the present situation, the greatest public health threat would occur if the creek were to ~~dry up completely~~, allowing PCB-contaminated sediments in the creek bed to be carried by the wind or by animals into nearby residential yards. Such a development appears to be ~~far in the future~~, at this point.

IEPA has submitted the Superfund "scoring package" for Superfund Sites Area I to U.S. EPA's Region V office, where it is under final review. This document is the basis for proposing the area containing Dead Creek for inclusion in the National Priorities List (NPL). The final package is expected to go to U.S. EPA headquarters ~~this month~~ and the federal agency could formally propose Area I for the NPL as soon as the spring of 1994.

## Eight-foot-high fence around part of Dead Creek

~~Question~~ In the 1980's U.S. EPA constructed a fence around Dead Creek Segment B (north of Judith Lane, to Quarry Ave., in Sauget), and around several other Superfund Sites (Site G, Site F,

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~~EPHRAIM~~ in order to limit public access and prevent exposure of the public to the chemical contamination known to be present at those sites. In some cases the danger was not only direct contact, but also the possibility of consuming contaminated fish from those waters. Another purpose of constructing the fence was to prevent any continued dumping of wastes at the sites.

#### **EPA "blocked the creek" at Judith Lane**

IEPA has no formal record of how the culvert under Judith Lane came to be blocked. We believe that the culvert was probably blocked in the late 1960s or early 1970s in order to halt the further southward migration of contaminants that were known to be moving into the two northern segments of the creek from adjacent hazardous waste sites. ~~It is not~~ presently clear what ~~governmental~~ ~~with~~ ~~an~~ private party ~~actually ordered or carried out the blocking action~~, but the finding in more recent years of PCB contamination in sediments above Judith Lane (as well as those south of Judith) makes this action seem prudent today. The fact that the PCBs tend to stay with the sediment particles, however, suggests a remedy for the concerns expressed by area residents. If water could be pumped out of Segment B to the nearby American Bottoms wastewater treatment plant, without disturbing the PCB-contaminated sediments, the water level could be reduced.

#### **Concerns about possible health hazards from odors in creek:**

Responding to concerns expressed over the summer by area residents, IEPA sampled the creek water both above Judith Lane (9/24/93, 9/28/93, & 10/15/93) and below Judith (10/15/93) to make sure the water did not pose a significant public health threat. IEPA's Office of Chemical Safety (OCS) concluded that the contaminants present in the water would not pose a public health risk, but noted that certain chemicals (notably phenolics) that were characteristic of Site G (west of Dead Creek south of Queeny Ave.) were found above the very low odor threshold for these chemicals. Residents would smell these chemical odors at levels far too low to be harmful.

The Office of Chemical safety also noted that the levels of iron, lead, and phenolic compounds in the water exceeded State water quality standards and would be potentially damaging to fish and other aquatic species.

#### **IEPA says not to drain the creek**

IEPA has long warned against disturbing the contaminated sediments in the creek, and the State has not had the funding

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that would have been needed to pay for pumping water from above Judith Lane into the American Bottoms treatment works. The IEPA has been open to that solution from the start of this unusual flooding event, but no party came forward with a workable way to get the water from the creek to the treatment works: no sewers existed nearby in Cahokia with the needed capacity.

However, as noted previously, based on both old and recent sampling, IEPA held the view that water could safely (from a human health standpoint) be pumped from this creek segment as long as the sediments were not disturbed. This could be accomplished by keeping the pump intake a sufficient height above the creek bed. Thus, the creek segment could not safely be pumped dry (not a desirable state anyway, since that would expose contaminated sediments), but it could be pumped down, considerably, to alleviate the flooding problem. Again, because tests of the water in Dead Creek north of Judith Lane have exceeded State water standards and could harm the environment, the IEPA has recommended the option of pumping the water to a treatment facility.

On November 16, 1993, after a particularly heavy series of storms, Mayor King, of Cahokia contacted IEPA to inform the Agency that Cahokia was starting to pump water from above Judith Lane to the next segment of Dead Creek. The mayor was informed that Cahokia was undertaking some risk of being drawn in as a Potentially Responsible Party if it were to be claimed in the future that this action had spread contamination from the area north of Judith Lane. IEPA also emphasized that recent tests of the surface water had shown levels of contamination that would violate state standards and might harm aquatic species if the water were not treated before being released to the environment. Cahokia officials were advised strongly to avoid placing the intake so as to disturb the contaminated sediments, however.

Further discussions with the mayor led to a phone conference with IEPA that concluded that no treatment process would be required for the emergency pumping to alleviate the flooding, based on IEPA's recent sampling results and the dilution with other runoff water prior to the water reaching the Mississippi River (see attached letter from Mayor King). The pumping continued for several days, was halted for several more, and was resumed when groundwater recharge apparently refilled the creek.

While the pumping continues, IEPA has periodically sampled the creek water. IEPA took a sample of the water being pumped from north of Judith Lane on 11/19/93 and found increased levels of phenolic compounds. Again, these levels do not indicate any human health risk, but they show an

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increased threat to aquatic organisms.

**Perceived hazard to residents from water seepage into basements:**

In response to concerns expressed by the McDonnell's, IEPA sampled the seepage water in their basement in June, 1993, and followed up on September 28 by re sampling that basement, and five others near the creek that had seepage problems. Stan Black, of IEPA's Office of Community Relations, notified all the residents by phone on October 12 that the sample results had been quite normal for basement seepage water, posing no health risk to residents. IEPA sent residents copies of the lab results for their records on November 9 & 10, and the Illinois Department of Public Health (IDPH) sent letters to the residents explaining the results in health terms on November 24.

**Property value concerns; Need to inform potential buyers:**

Stan Black, of IEPA's Office of Community Relations, had indeed mentioned to Diane McDonnell in the course of a phone conversation that several realtors and/or appraisers from her area had called him to obtain information on contamination in the Dead Creek area. They had specifically mentioned that they had a professional "duty to inform" potential buyers in the area about possibly adverse factors that could affect property values. Part of the motivation for IEPA's effort to add Area I to the NFL is the desire to remedy the environmental problems in the area so that local residents will not need to be concerned about their effects on property values.

This response to your inquiry has been delayed by the fluidity of the Dead Creek situation. Indeed, matters have not yet reached a settled state, by any means. We are sending your office this response in order to be as complete as possible at this time, but we will also provide further updates as additional developments occur.

If I can be of further assistance, please do not hesitate to call.

Sincerely,

*Thomas P. Walters*

Thomas P. Walters  
Legislative Liaison

MGkm1048

Enclosure